

Attachment 6

Draft CPG Goals Discussion Comments

Overall Concerns/comments

A lot of these goals are already being done.

To DOE: Once a jurisdiction/agency has reached its stated goal, acknowledge and don't ask for more.

Concern if goals become mandatory- what about \$?

Make goals connected to reports they come from (i.e. there is the MRW reporting form and the CPG MRW reporting form.)

Concern regarding legislative buy-in if too much.

Concern on changing priorities of the basic SW handling system- we want to maintain baseline funding.

Heal department needs forum to share successes. Meeting or NL or listserv more statewide.

SW Enforcement- How many facilities are not in compliance? How do you measure?

We should have an umbrella goal for the program: Support local planning and program implementation efforts for comprehensive solid and hazardous waste management plans.

Concern that all of my projects have to fit into goals.

Could we add Beyond Waste goals for consideration and identify which of these are Beyond Waste goals?

For the %'s there's not an easy baseline.

Address reduction or elimination of priority substances in Beyond Waste.

Message to the committee:

1. More Health District personnel should have been involved in developing process and goals.
2. Would like terms to be clearly defined.
3. Identify your criteria for goals; e.g. will that goal be measurable? Will this goal protect public health? Does this protect the state of long term public health? (impact)
4. Don't give grant to do something another county has received a grant for and is doing well.
5. Would like to see abstracts on grants that are issued (website) info available to educate/compare.
6. Small counties have trouble coming up with match. Maybe program to waive match.
7. Be clear about issues around firewall.

MRW

General:

- Define “reuse,” “recycle,” and “recover.”
- MRW-related preferable purchasing policies will not work in Mason County due to budget issues. If this is voluntary, it would have to be regulatory.
- Health districts serve different roles in different counties. In many counties, Health Department doesn’t do MRW programs.
- Short- and long-term goals need to be stated i.e. 70% reduction from base year.

#1 X % reduction in Hazardous Waste generation per capita (from 2004 level)

- Define “per capita;” don’t know how to get to this rate with current data.
- Look at education programs, pilot projects.
- How will we count “generation”? Clarify.
- Lots of questions about accuracy.
- To know what current Haz waste generation per capita is hard to determine.
- Reduction vs. improved collection numbers in use?
- Goal of % generation- how do we quantify reduction? Also how do we get baseline? Challenging to measure. Is it a short-term goal?- Hazardous materials.
- Does not measure “success”. Revision: Reduction in MRW in municipal SW stream.

#2 50% of county governments have MRW-related Environmentally Preferable Purchasing policies in place

- May not always be possible. Should be long-term.
- Limits the choice of county governments. The material isn’t as good as new or as cost-effective.
- There is no universal measure, and we aren’t sure that we want one.

#3 X % (90) of MRW collected is reused or recycled

- 90% seems high. Needs to be understood this is a state goal that not every jurisdiction needs to meet.
- Need to better define reuse/recycle. Qualifications? Some wastes we don’t want in waste stream anymore.
- We aren’t doing a good job collecting, so focus on that.
- heartburn economically (Yakima)
- 90% too high. There are some materials we don’t want to reuse or recycle, so it should read that the 90% goal should be for materials appropriate to reuse or recycle.
- Define “reuse,” “recycle,” and “recover.”

- 90% is too high. Data isn't consistent (counties use different measurements)

#4 X % of residents live within Y (10? 20?) miles of an MRW collection site

- 20 miles is too close together.
- Long Term
- Difficult for rural counties. Why do we want all these facilities?
- #11 is more realistic than #4.
- Infeasible in some counties- a lot of population not located close enough- won't work for some rural counties. Difficult to reach for some rural counties.
- cost prohibitive (east v. west). What does "collection site" mean? (Point of purchase ok vs. facility) Geography could say "20-minute drive"
- Unrealistic in rural areas
- Not hard, fast number of miles- use "perception of" as goal ("perceive that MRW site is available")
- Some minimum level of service to all WA residents to MRW collection.

#5 100% of counties are served by an education program that addresses PBTs

- 100% too high- why PBTs?

#6 X% of waste motor oil sold in Washington is recycled rather than disposed

- Difficult to quantify for border counties [bordering on Idaho, Oregon, etc.] Difficult to calculate/measure because oil moves around. Need a definition for recycling of oil (i.e. use oil used for heating oil.)
- The way it's worded- "waste motor oil being sold" should be just "motor oil sold." Collection a more important focus.
- Define "recycled"

#7 X% of motor oil sold in Washington contains recycled oil

- How to measure? Made from recycle oil or mixed? Too vague.
- How do counties get that information? Needs strong partnership with oil refiners and car manufacturers.
- Market-driven- consumer choice government shouldn't drive/dictate.
- Industry driven- make it attainable but stretch
- How can CPG \$ leverage this?

#8 100% of residents have access to electronics recycling without end-of-life fees

- Good goal.
- Why no end of life fees?
- This will take statutory change- how could we do it through CPG \$? (Take off "without end of life fees" = City can't incur added cost)

#9 X% of car batteries are recycled

- Change “car” to “vehicle” or “lead-acid”
- Don’t put more effort into this- already works- program might drop if we do.
- Change it/focus it and move to #10- possibly add mercury.

#10 X% of fluorescent bulbs/tubes are recycled

- Mercury? Will there be fluorescent bulbs in 30 years? Pick benchmarks that have “staying power”

#11 100% of residents have access to a fixed MRW collection facility within their jurisdiction

- What does “access” mean?
- Thought 100% was too high a goal. Doesn’t work in rural areas. Shouldn’t be a long-term goal; change to short term and change percentage. Temp MRW collection better in rural.
- Define “access.” Facilities further apart in rural areas.
- Need to eliminate “within jurisdiction.” Remove last line. Change “fixed” to “access for full service MRW collection”
- 100% too high (within jurisdiction)- keep high
- Unrealistic in rural areas
- CPG funded?
- Cost concern supplementing CPG \$
- MRWA: How would we use CPG \$’s? (Improve infrastructure)

Organics

General

- Like the way the short-term organic goals are phrased.
- Short term goals seem too modest.
- Toxic control funds best used for these projects? If yes, Ecology could articulate reasons.
- Organics not as important as other categories.
- Terms to define: post-consumer food waste, food processing waste.
- Composting facilities subject to 173-350 permitting and performance standards.

#13 1 food waste collection pilot has taken place in each region (CRO, ERO, NWRO, SWRO)

- We’re almost there now. Post consumer or restaurant? This will be difficult in ERO/CRO—counties already have plans for the next cycle

- Subtract 1 from each region- say 4 but don't specify by region – encourage a pilot program. Add word “new” pilot projects – if we want to grow it, we need new projects.
- #13, 15, 16 Logistical nightmare to quantify.

#15 X% reduction in per capita food waste disposed in MSW facilities (from 2004)

- Per capita equation?
- #15 Included in 16 – a subset or change 16 to exclude measuring both food waste and yard waste.
- If there is a baseline established
- #15-17 reduction idea ok. Measurement a problem. How is it reduced? Recovery program?
- #15-17 How is 16 different from 15 and 17? Includes other organics (eg paper)- should say “total organics”

#17 X% reduction in per capita yard waste disposed in MSW facilities (from 2004)

- Included in 16 – combine 15-17. Depends how you want to measure it.
- % of reduction?

#18 80% of homeowners have access to a home composting program

- Define access. Education key (so-called compost bins created some problems – calling disposal composting, rodents, etc.
- Should be “community composter”
- #18, 19 Success!

#19 50% of counties are served by education on “organic” gardening at a public venue (e.g. county fairs, home shows, demonstration garden)

- Wording is odd – is it the counties doing the education or are they being served by someone? In conflict with organics diversion. Not all compost can be used on organic farms.
- O-A Not required, just encouraged- how do we use CPG to make it happen? (Port Townsend is doing it)

Green Building

General

- What are the regulatory barriers to green building?
- People in roads and building would have problems with that.
- Small counties getting staff up to speed to educate others - \$ to train?

#20 Green building education program is available to developers, contractors & builders in the five most populous counties in Washington

- Good goal.
- Already happening

#21 One county in each region has adopted green building incentives

- This is going to be difficult to accomplish based on local SW management plans. Great goal, but not realistic.
- Clarify county/city governments. Clarify incentives.
- Thought geographical areas were meaningless “regions”. Not sold on green building – should be market driven or educational driven change.

#22 One local government develops a pilot program to track the increase in green building activities in their county

- Change “their” to its one county within the state will develop a pilot for that jurisdiction that can be used by others.
- Thought geographical areas were meaningless “regions”. Not sold on green building – should be market driven or educational driven change.

#24 X% increase in recycling of construction and demolition debris (from 2004)

- Keep as changed
- Good for Kittitas County

#25 X% of new homes meet or exceed Green Built standards

- Should be market-driven. Not sure what Green Built standards are.
- Get specific that shows how CPG \$ would be used?
- Needs to be “Built Green” or similar program or standards.
- Should be new and remodeled homes.
- How do you measure this? What are green built standards?

#26 X% of new commercial buildings meet or exceed LEED standards

- People choosing to follow LEED without going through certification process.
- Issue with LEED standards- not debated in open, public debate- just encourage green practices.
- Should be new and remodeled homes. Thought geographical areas were meaningless “regions”. Not sold on green building – should be market driven or educational driven change.

Enforcement

General

- Why including illegal dumping prevention projects (could go under “other”)
- Political issue “nuisance complaints” on residential properties.
- What is the minimum area of “in compliance”?
- What are the big concerns? Should there be a two-tiered approach?
- Illegal dumping needs to specifically address white goods and durable goods.
- Remove “in compliance” with #28, 29, 30.
- Long term clean-up of major illegal dump sites is unrealistic because they keep happening.
- “Cleaned-up” takes time; stop use can be immediate.
- “Septage” means biosolids? (needs definition) (Septage is generally different from biosolids.)

#27 Three model illegal dump prevention projects developed and implemented

- Move to WRR
- Planning jurisdictions should do this. JHD don’t have enough time and money to accomplish current workload.
- Having a way to showcase these ideas is important. Ex: using camera at dumpsite reduced dumping dramatically. Broaden out to prevention programs. It shouldn’t take away from care responsibilities. Remove “illegal dumping” as long as people understand what “prevention program” is.
- Should be a supplemental. Could it be non-CPG funds? Need for info exchange on complete programs. Include prevention projects instead of just illegal dumping.
- Provide more \$ for prev. programs. Info about existing programs.

#28 All operating MSW landfills are permitted under WAC 173-351 and in compliance

- Should say “fully permitted” What’s “in compliance”
- #28-30 It’s the law. Do it.
- #28, 30 remove “and in compliance”
- #28-31 Timeframe? Realistic

#29 All closed landfills permitted under WAC 173-304 or WAC 173-351 are in compliance with their post-closure requirements

- All applicable facilities have post-closure permitting.

#30 All operating solid waste handling facilities are permitted under WAC 173-350 and in compliance

- Include MRW

#31 All septage facilities and disposal sites are under permit

- Good goal.
- Need to include septage/biosolids. Clarify.
- Not sure locals, health should be doing this. But if so, we do want to be able to use CPG funds.
- Is it CPG eligible? (Yes.)

#32 80% of major illegal dump sites are cleaned up (as of 2004)

- Clarify. What will this measure? Through enforcement or by county? By whom?
- Need definition of “major,” and “cleaned up.” Need to clarify public/private property. Add the word “identified” to major illegal dump.
- Needs to be defined better- it’s a moving target now- define what “major” means. 80% (of those identified in 2004) of major dumpsites are cleaned up within 30 years. Who has identified. Where do we draw the line to define what a major or substantial dumpsite is? Are we talking about constantly cleaning up or eliminating these dumpsites.
- Clarify- What’s “cleaned up”?

#33 50% of CESQGs have access to business technical assistance for pollution prevention

- Move to MRW. Ecology hazardous waste does this.
- 50% is low. Need to define technical assistance.
- This goal belongs under MRW.
- Move to MRW. Some here think 50% is low.
- Good long-term goal in MRW category. Move to MRW

WRR

General

- Goals volume-focused; don’t miss education programs.
- Redundancy in long-term goals #36, 37, 40.
- Where is education piece? (added)
- Recognize energy generation as recycling.

#34 100% scrap metal dealers are reporting their annual recycling numbers to Ecology

- What is role of CPG funding?

- Percentage too high.
- CPG connection? Logistics of reporting/collecting info.
- Number should come from county of origin. Expand to all recyclers. Can we count industrial recycling?
- Why just scrap?

#35 Tire piles are accurately inventoried in every county

- SWE
- Perhaps this goal belongs under SW enforcement. Need a S.T. goal for number of enforcement actions increase for SW violators.
- Needs to read “inventoried and reported.” Need a definition of tire piles (how many tires?). Add 100%. Want zoonotic goals. Move to SWE.
- Move tire piles to Enforcement category.
- Assessed or estimated. Move to SWE.
- Re: tonnage (from small county), “buy back” program from landfill.

#36 X% residential waste is recycled

- Diversion rate vs. recycling rate. What are we measuring?
- From small county standpoint, hard to be in compliance. Where do funds come from? Should this be a CPG goal?
- #36-37 MSW
- Define residential waste.
- Thumbs up!

#37 Residential waste generation is less than X pounds per person per day

- Don’t look at lbs/day. Look at % reduced/2004
- Very nice.
- It should be municipal SW generation (how to measure)

#38 X% of the population has residential collection rates that provide financial incentives for waste reduction and recycling (Pay-as-you-throw graduated disposal cost)

- Very good – Eastern Washington will need extra money.
- Encourage local governments to do this, not state. State shouldn’t drive this process. May penalize eventually those that can’t recycle/reduce
- When people are disposing waste, they should pay for it. They are being penalized – philosophical. Should reflect cost of waste and not what you toss.

#39 100% of urban businesses have access to recycling collection

- What’s an “Urban” business? (set standard) 100%?
- Reuse waste on site.

- Ok.

#40 Less than x pounds of MSW is disposed per \$1,000 economic activity per year

- Let CTED do it. Only will work at the state level – local level cannot measure.
- Vague. Needs more explanation.
- Urban/rural problems?
- Ok for DOE to pursue
- Not sure what it means. Not a meaningful goal.

#41 By 2020, replace 50% of disposal fee funding for waste reduction and recycling programs with other fund sources

- Dangerous goal – can't afford to have the uneducated get a hold of the goal. Maybe change goal to identify alternative funding sources for WRR programs – needs to be a long-term goal.
- Taking away from basic infrastructure – keep out baseline functions – have other alternatives been thought of?
- Have other alternatives been thought of?
- Is it grant eligible? Maybe not but it's a worthy goal- we need to do it!

Other

#42 10 model education projects including tools developed for 2006-2007 grant cycle

- More specifics. No reinventing the wheel.
- #42, 43 What is the goal? These seem like ideas.

#43 Three multi-jurisdictional collaborative projects

- Have multi-jurisdictional project just for the sake of it- why multi-jurisdictional? Why limit it to three?
- Good – could add “public or private.”
- More specific

#44 Develop an information clearinghouse system that shares local and state information and products

- Happening now!
- Should this be a CPG goal? Local should participate in development and use site.

#45 Three evaluation projects funded with CPG to develop methods to quantify outcomes and address the issue of difficult-to-measure projects

- Don't like #. Have 1 person do.

- #45, 46, 48 Yes!

#46 Include criteria in CPG Guidelines for funding emerging issue projects that are not covered by the statewide goals.

- As long as compatible – LTCA authorizing legislation.
- Should not be a criteria

#47 75% high school juniors sampled pass a solid waste/environmental/sustainability comprehension test

- Must have short-term goal that directly ties to this.
- Add to WASL (just kidding!). May not be realistic.
- Don't like the test. Want in curriculum.
- Will testing work? How?
- Would rather see curriculum focus, not more testing.
- Juniors? Specific? Test problems? Disparity issues? Survey. Changed behavior.
- Need more short-term educational goals. Teach the three R's first. Arbitrary age percentage.
- Action-not goal. Goal- education (work with younger kids) Group supports "spirit" but feels goal of education comes first.

#48 Define approach to shared/statewide measurement issues. For example, waste composition studies, sampling the impact of education programs etc.

- Should be short-term.